

EXHIBIT B

PART 3 OF 3

Acxiom Contract

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

- 1 Before FAFSA point of entry
- 2 Final deal deck
- 3 Wims Morris: the idea came after
- 4 Sweeney: validation was not a priority before signing
- 5 Sweeney: Acxiom exercise changed over time
- 6 Charlie Javice sends contract snippet to Sweeney
- 7 Charlie Javice sends full snippet to Sweeney
- 8 Toland asks for validation for the first time
- 9 Toland asks for validation again
- 10 LionTree was involved
- 11 "Marketing attributes" sent to JPMC
- 12 The synthetic data files included PII
- 13 Leslie Wims Morris and Alex Sweeney keeping secrets

Sweeney: Data Validation Was Not A Priority Before Signing

Case 1:23-cr-00261-AKH Document 381-5 Filed 04/25/25 Page 5 of 63

The Contract

Acxiom

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Data

LionTree

Government Case

Alex Sweeney Testimony

22 Q. Let me ask you this. When this actually came up,
23 Ms. Morris' direction was this was not a priority before
24 signing; correct?

4 A. Earlier in the transaction, Leslie had not considered this
5 a priority; yes.

P361JAV1

1388

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----x
4 UNITED STATES OF AMERICA,

5 v.

6 CHARLIE JAVICE, OLIVIER A.

7 Defendants

8 Before:

9 HON. AL

10 MATTHEW PODOLSKY

11 Acting United States
12 Southern District of

13 BY: MICAH F. FERGENSON

14 RUSHMI BHASKARAN

15 GEORGIA V. KOSTOPOULOS

16 NICHOLAS W. CHIUCHIOI

17 Assistant United States

18 BAEZ LAW FIRM

19 Attorneys for Defendants

20 BY: JOSE A. BAEZ

21 RONALD SULLIVAN LAW PLLC

22 Attorneys for Defendants

23 BY: RONALD S. SULLIVAN, C

24 RICHARD M. DE MARIA

25 Attorney for Defendant

26 QUINN EMANUEL URQUHART & S

27 Attorneys for Defendant Charlie Javice

28 BY: CHRISTOPHER TAYBACK

29 ERICA PERDOMO

30 EGIN BEIRNE

31 KIRSTEN NELSON

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

The Contract

Axiom

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Data

LionTree

Government Case

From: Charlie Javice [charlie@withfrank.org]
on behalf of Charlie Javice <charlie@withfrank.org> [charlie@withfrank.org]
Sent: 8/4/2021 9:31:56 PM
To: Sweeney, Alex [alex.sweeney@chase.com]
Subject: Re: Axiom NDA and TPPA Template

Services. Company shall send the following Company Data to Axiom: up to 4 million records of customer data (no PII) with **attribute data**. Axiom will receive the Company Data and validate the coverage of the **attribute data**. Axiom shall not combine the Company Data with any other data, including during the validation process. Axiom will then provide a written report regarding the coverage of the **attribute data** ("Report") to Company. The Report will not contain any Company Data or PII. Axiom shall not provide the Report to any third party except upon receipt of Company's express-written consent.

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Alex Sweeney Testimony

12 Q. Do you recall testifying about this document a little
13 earlier?
14 A. Yes.
15 Q. You testified that on this highlighted section, which is
16 the last sentence; correct?
17 A. Yes.
18 Q. Did you highlight that section?
19 A. I did not.
20 Q. So it is your testimony, sir, that you read the last line
21 but never the first line?
22 A. Yes.

From: Matt Tabor [mailto:Matt.Tabor@axiom.com]
Sent: Wednesday, August 4, 2021 1:53 PM
To: Alex Sweeney [mailto:alex.sweeney@chase.com]
Cc: Alex Sweeney [mailto:alex.sweeney@chase.com]; Charlie Javice [mailto:charlie@withfrank.org]
Subject: RE: Axiom NDA and TPPA Template



PIIA Confidential Treatment Requested by JPMorgan Chase Bank, N.A.

JPM, 0000224

The Contract

Acxiom

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Data

LionTree

Government Case

August 4, 2021

Alex Sweeney Testimony

23 Q. So, it is your testimony, sir, that on the date of the
24 Acxiom exercise, for this company you are paying \$175 million
25 for, she sends you a copy of the contract and you never even
1 saw this e-mail?

2 A. Yes.

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Matthew Toland Testimony

21 Q. You asked JPMorgan Chase if they wanted to further validate
22 the data, correct?

23 A. Yes, sir.

8 Q. Who was your point of contact over there?

9 A. It was Alex Sweeney, I believe, at JPMorgan Chase.

10 Q. Okay. And what did Mr. Sweeney respond as to whether he
11 wanted you to validate the data?

12 A. He didn't.

P301JAV1

3138

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,
5
6 v.
7
8
9
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23 Cr. 251 (AKH)

Matthew Toland Testimony

15 Q. And after your company had performed the analysis that was
16 done, did you ask them again? Did you reach out to JPMorgan
17 again and ask them?
18 A. No. That was at the end.

Attorney for Defendant Charlie Javice
QUINN EMANUEL URQUHART & SULLIVAN, LLP
Attorneys for Defendant Charlie Javice
BY: CHRISTOPHER TAYBACK
ERICA PERDOMO
BOIN BEIRNE
KIRSTEN NELSON

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The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

Matthew Toland Testimony

P301JAV1

3138

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,

v.

23 Cr. 251 (AKH)

CHARLIE JAVICE, OLIVIER AMAR,

-----X

Defendants.

Jury Trial

New York, N.Y.
March 24, 2025
10:13 a.m.

Before:

HON. ALVIN K. HELLERSTEIN,

District Judge

APPEARANCES

MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York

BY: MICAH F. FERGENSON
RUSHMI BHASKARAN
GEORGIA V. KOSTOPOULOS
NICHOLAS W. CHIUCHIOLLO
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12 A. We met with both parties on the phone. Historically, when
13 we've done this type of project, we've taken data from the
14 third party, which would be Frank in this situation, and we've
15 matched it to other data, and that becomes the reporting that
16 we provide so that they can determine what they want to do.
17 We're not told what the outcome is going to be of this or what
18 they're actually doing. We're kept in the dark about that. So
19 on the call, we said no—or Chase and Frank agreed that we were
20 to look at the file, tell whether it's populated or not, and
21 that's it. We did that, provided the reporting, and then after
22 the reporting was provided, we asked JPMC if they'd like us to
23 do something further. We can't just go on what JPMC says, we
24 need both parties' consent, but we just put it out there.

Toland Asks For Validation Again

The Contract

Acxiom

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Data

LionTree

Government Case

Matthew Toland Testimony

P301JAV1

3138

1 UNITED STATES DISTRICT COURT
 2 SOUTHERN DISTRICT OF NEW YORK
 3 -----X
 4 UNITED STATES OF AMERICA,

v.

23 Cr. 251 (AKH)

CHARLIE JAVICE, OLIVIER AMAR,

Defendants.

Jury Trial

-----X

New York, N.Y.
 March 24, 2025
 10:13 a.m.

Before:

HON. ALVIN K. HELLERSTEIN,

District Judge

APPEARANCES

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 16 we provide so that they can determine what they want to do.
 17 We're not told what the outcome is going to be of this or what
 18 they're actually doing. We're kept in the dark about that. So
 19 on the call, we said no—or Chase and Frank agreed that we were
 20 to look at the file, tell whether it's populated or not, and
 21 that's it. We did that, provided the reporting, and then after
 22 the reporting was provided, we asked JPMC if they'd like us to
 23 do something further. We can't just go on what JPMC says, we
 24 need both parties' consent, but we just put it out there.

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

From: Charlie Javice (charlie@withfrank.org)
on behalf of Charlie Javice <charlie@withfrank.org> [charlie@withfrank.org]
Sent: 8/4/2023 8:10:21 PM
To: Wims Morris, Leslie [leslie.wimsmorris@chase.com]; Sweeney, Alex [alex.sweeney@chase.com]
BCC: Braun, Ben [bbraun@liontree.com]
Subject: Draft internal data counts
Attachments: Finland_internal data counts.pdf

See below. Happy to chat.

Charlie

Data Variable Validation Request Details

How many UNIQUE customer accounts exist? 4,265,065
Of those records, what % include each data field below?

Variable	% Captured	Comments	Count
STUDENT_FIRST_NAME	100.00%		4,265,065
STUDENT_LAST_NAME	100.00%		4,265,065
STUDENT_EMAIL	100.00%	Provided as Unique ID	4,265,065
STUDENT_PHONE_NUM	100.00%		4,265,065
STUDENT_HOME_ADDR	99.21%	Provided as Unique ID	3,847,688
STUDENT_BIRTHDAY	99.21%		3,847,688
STUDENT_MAJR_INTRST	48.98%	Data limited due to application addition (added major field in 2019)	2,080,875
YEAR_OF_SCHOOL	99.00%		3,968,599
DEGREE_LEVEL	99.00%		3,968,599
CITY_OF_HIGH_SCHOOL	82.95%		3,539,751
STUDENT_IS_MARRIED	81.33%		3,468,698
HAS_CHILDREN	81.33%		3,468,698
MILITARY_STATUS	81.33%	Data limited due to application logic	3,468,698
PARENT_NUM_CHILDREN_FIN_SUPP	81.33%	Data limited due to application logic	3,468,698
STUDENT_COMPLETED_TAX_RETURN	57.97%	Data limited due to application logic	2,472,668
STUDENT_EARNINGS_WORKING	89.52%	Data limited due to application logic	3,434,247
STUDENT_CASH_ASSETS	89.52%		3,434,247
NET_WORTH_STUDENT_INVESTMENTS	57.97%	Data limited due to application logic	2,472,668
IS_US_CITIZEN	57.39%		2,447,581
STUDENT ADJUSTED GROSS INCOME	89.52%		3,434,247
NUMBER OF SCHOOLS TO SEND TA/SA	99.21%		3,847,688
STUDENT_HOME_ADDR_APT		Provided as Unique ID ** merged with top data field	
STUDENT SPOUSE EARNINGS WORKING		Data limited due to application logic ** household adjusted gross income w/ adjusted gross income	

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US

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GX	FILE NAME
GX 501	Frank_Marketing
GX 502	Frank_18_134955
GX 503	Frank_18_134955

```

1  # Import the random module
2  import random
3
4  # Set the seed
5  random.seed(1)
6
7  # Generate 10 random numbers
8  for i in range(10):
9      # Generate a random number
10     num = random.random()
11
12     # Print the number
13     print(num)

```

5 Q. Even without seeing what is there you know that marketing
6 attribute is different from marketing list; right?

9 A. Correct.

The Contract

Axiom

ASL

GX3.1.4

Data

LionTree

Government Case

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	ACXION RESULTS														
2															
3	STUDENT_FIRST_NAME	4,265,085	4,265,085	100.00%											
4	STUDENT_LAST_NAME	4,265,047	4,265,085	100.00%											
5	STUDENT_EMAIL	4,265,085	4,265,085	100.00%											
6	STUDENT_PHONE_NUM	4,265,085	4,265,085	100.00%											
7	STUDENT_HOME_ADDR	3,847,533	4,265,085	90.21%											
8															
9	STUDENT_BIRTHDAY	3,847,533	4,265,085	90.21%											
10	STUDENT_MAJR_INTRST	2,088,875	4,265,085	48.98%											
11	YEAR_OF_SCHOOL	3,966,529	4,265,085	93.00%											
12	DEGREE_LEVEL	3,966,529	4,265,085	93.00%											
13	CITY_OF_HIGH_SCHOOL	3,539,731	4,265,085	82.99%											
14	STUDENT_IS_MARRIED	3,468,936	4,265,085	81.33%											
15	HAS_CHILDREN	3,468,936	4,265,085	81.33%											
16	MILITARY_STATUS	3,468,936	4,265,085	81.33%											
17	PARENT_NUM_CHILDREN_FIN_SUPP	3,468,936	4,265,085	81.33%											
18	STUDENT_COMPLETED_TAX_RETURN	2,472,658	4,265,085	57.97%											
19	STUDENT_EARNINGS_WORKING	3,434,247	4,265,085	80.52%											
20															
21	STUDENT_CASH_ASSETS	3,434,247	4,265,085	80.52%											
22	NET_WORTH_STUDENT_INVESTMENTS	2,472,658	4,265,085	57.97%											
23	IS_US_CITIZEN	2,447,931	4,265,085	57.39%											
24	STUDENT_ADJUSTED_GROSS_INCOME	3,434,247	4,265,085	80.52%											
25	NUM_OF_SCHOOLS_TO_SEND_FAFSA	3,847,533	4,265,085	90.21%											
26															

GX1292-A

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

1388

P361JAV1

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
2 -----X
3 UNITED STATES OF AMERICA,
4 v. 23 Cr. 251 (AKH)
5 CHARLIE JAVICE, OLIVIER AMAR,
6 Defendants. Jury Trial
7 -----X New York, N.Y.
8 March 6, 2025
9 Before: 10:20 a.m.
10
11 HON. ALVIN K. HELLERSTEIN,
District Judge
12
13 APPEARANCES
14 MATTHEW PODOLSKY
Acting United States Attorney for the
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15 BY: MICAH F. FERGENSON
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SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Alex Sweeney Testimony

17 Q. After this was over in March of 2022, you got back involved
18 with Frank when there was discussions about how many marketable
19 users there were. Do you recall that?

20 A. Yes.

21 Q. At that point in time you had an e-mail exchange with
22 Leslie Wims Morris where she did not want you to disclose
23 anything about the Acxiom exercise and told you to keep it
24 tight.

25 Do you recall that?

1 A. Is there something you are referencing? I don't recall off
2 the top of my head.

3 Q. Yes.

4 MR. BAEZ: Let's bring up 01:24:44.

5 Q. Do you see that that is an e-mail from her to you?

6 A. Yes.

7 MR. BAEZ: Let's close that out and let him read it so
8 it may refresh his recollection.

9 Q. Do you see that where she is asking you to keep it tight?

13 A. That is what the words say, yes.

The Contract

Acxiom

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Data

LionTree

Government Case

1

3.1.4 projections

2

Initially asked for 10 million students

3

Email campaign

4

Augment the data to add value to existing asset

5

JPMC was aware of and paid for the ASL list

6

Buying data is common practice in business

3.1.4 Projections

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

Default Channel Grouping							
Year	Month of the year	All New Users	Paid Users	Non-Paid Users	(Other)	Direct	Display
2021	11	74,031	20	74,011	2,605	7,558	
	12	63,513	1,045	62,468	1,429	5,020	292
	1	88,236	10,165	78,071	1,322	4,074	6,490
	2	57,564	4,137	53,427	496	3,089	3,679
	3	65,109	951	64,158	480	6,192	13
	4	103,823	38,869	64,954	1,169	7,863	9,384
Projections	5	128,467	66,329	62,138	3,551	7,275	42,481
	6	94,679	40,768	53,911	2,299	6,194	10,396
	7	214,466	24,000	190,466			
	8	205,856	40,000	165,856			
	9	345,782	80,000	265,782			
	10	930,000	130,000	800,000			
Grand Total to Date	11	700,000	100,000	600,000			
	12	310,000	60,000	250,000			
2021 Projections		8,130,553	2,768,184	5,362,369			
Notes		2021 Non-Paid is dependent on SLM, Instride, ACT, Wiley accounts. Pipeline is Additive As Contracts Come In. Product mix is based on partner campaigns that are scheduled for 2021. 2021 Paid spend is classified in Q1 of 2021 testing. Classfinder accounts created upon credit card entry. This is a different CACs to optimize learnings and not Frank accounts. 2019 - Q1 2020 Spend is to optimize for different segments around college recommendations (nursing students only above the age of 23 for example). 2017 - Jan 2018 Burst testing to test the scale, paid marketing costs at scale, positioning & brand building as we invested in content that has a return 12+ months later. 2020 - accounts added across products.					

Channel & Product breakdown

The Contract

Acxiom

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LionTree

Government Case

P355jav1

1195

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,

5 v.

23 Cr. 251 (AKH)

6 CHARLIE JAVICE, OLIVIER AMAR,

Steven Stolls Testimony

17 Q. So it is correct that they made an initial request of

18 10 million records.

19 A. Appears that way, yes.

20 Attorney for Defendant Charlie Javice

21 QUINN EMANUEL URQUHART & SULLIVAN, LLP
22 Attorneys for Defendant Charlie Javice
23 BY: CHRISTOPHER TAYBACK
24 ERICA FERDOMO
25

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Frank Was Preparing For A Potential Email Campaign

Case 1:23-cr-00251-AKH Document 381-5 Filed 04/25/25 Page 19 of 68

The Contract

Acxiom

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GX3.1.4

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LionTree

Government Case

Jen Wong Testimony

P341JAV1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,

5 v.

6 CHARLIE JAVICE, OLIVIER AMAR,
7 Defendants.
8 -----X

9 Before:

10 HON. ALVIN K. HELLERSTEIN

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33 KIRSTEN NELSON

34 SOUTHERN DISTRICT REPORTER
35 (212) 805-0300

19 Q. Now did there come a time when Mr. Amar discussed a
20 marketing campaign using third-party data with you?

21 A. Yes.

22 Q. And approximately when was that?

23 A. Summer 2021.

2 Q. And Ms. Wong, what ultimately happened with this proposed
3 email campaign using third-party data?

4 A. We didn't do it.

The Contract

Acxiom

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Data

LionTree

Government Case

GX2330

CJ2171

ASLmarketing

ASL Order Number: 709-2021
Data Issued: AUGUST 4, 2021

Data Rental Agreement

Client Contact Info		ASL Marketing Contact Info	
Customer Name	WESTFRANK LOUIS	ASL Accounting Contact	Sue Maguire
Primary Contact	OLIVER AMAR	ASL Sales Rep	DEBBIE LYNN
Phone	[REDACTED]	Phone	516.348.6100
Email	[REDACTED]	Email	dm@acxiom.com
Billing Contact	OLIVER AMAR		
Customer	WESTFRANK LOUIS		
Billing Address	12 EAST 49TH STREET - 11TH FLOOR		
Address	NEW YORK, NY 10017		
Phone	[REDACTED]		
Fax	[REDACTED]		
Billing Email	olmar@cfbank.us		

Total Cost
\$105,000.00

Campaign/Util Dates	Description	Notes	Quantity	Price per unit	Total Cost
INTERNAL USE	Postal Address		2,393,111		\$105,000.00
	Email Address		2,465,489		
	Class Years AG				
	File Years: 2017 - 2021				
					\$105,000.00

Notes:

Payment Terms: CREDIT CARD

Data Rental Terms and Conditions:

Use Rental Terms and Conditions: Due to the confidential nature of the student information to be provided to you by ASL Marketing, unless otherwise agreed by ASL in writing, the authorized use of the data and any information contained therein is limited to the specific Customer named above. Customer warrants that such use shall conform to all applicable privacy protection guidelines, all federal, state and local laws, statutes, rules, regulations, and policies, with limitation, the CAN-SPAM Act, the Do-Not-Call Registry under the FTC's Telemarketing Sales Rule and the Telephone Consumer Protection Act, and shall be completely ethical and in good taste. In the event Customer fails to use data within sixty (60) days after delivery, there shall be a separate charge for any data which, varies, updates, or change thereafter requested by Customer. All fees must be paid according to the terms set forth above in this document. ASL does not and will not warrant that the names, addresses, and e-mail addresses of individuals contained in its data are not contained on any lists of consumers or persons who do not wish to receive e-mail communications or direct mail offers. The cumulative liability of ASL to Customer for losses relating to or arising in connection with these terms or data provided hereunder shall be limited to the fees actually paid by ASL to Customer. ASL disclaims all representations and warranties of any kind or nature, express or implied, arising out of or related to these terms or to data provided hereunder, including without limitation, any warranties regarding quality, correctness, completeness, suitability, fitness for a particular purpose, or otherwise, each of which is hereby expressly excluded by agreement of the parties. These terms supersede any different terms in Customer's Purchase Order. The signature at the bottom of this form indicates acceptance of the ASL data rental terms and conditions and constitutes Customer's representation and warranty.

ASL Marketing

Client's Signature

Signature DATE

Signature DATE

Print Name Title

Print Name Title

Payor	Payee	Payment Instructions (Banking/Wire Information)	Amount	Note
JP Morgan Chase Bank, N.A.	Acxiom Financial LLC	Routing Number: 021000088 Account Number: 965000184 Account Title: Acxiom Financial LLC Special Account for the Exclusive Benefit of Acxiom Financial LLC Customers Additional Information: 500602 - JP Morgan Chase, National Association FBO TAPD, Inc. Paying Account HSBC Bank USA, NA 452 Fifth Ave New York, NY 10018 Callback Information: Jordyn Stadler (720.452.2309 or 303.815.4177) and Zelle Garrett (720.709.1204 or 802.355.1755)	\$ 141,958,799.67	For further distribution to stockholders, warrant holders, non-employee option holders, and non-employee Selling Expense recipients
JP Morgan Chase Bank, N.A.	Acxiom Clearinghouse LLC	Escrow account title: Project Frontier Seller Holdback Escrow Account Number: 953030563 Routing Number: 022000020 ABA Number: 021000088 SWIFT Code: MIMDUS33 HSBC Bank USA, NA 452 Fifth Ave New York, NY 10018 Callback Information: Jordyn Stadler (720.452.2309 or 303.815.4177) and Zelle Garrett (720.709.1204 or 802.355.1755)	\$ 3,000,000.00	Seller Holdback Escrow Amount
JP Morgan Chase Bank, N.A.	Acxiom Clearinghouse LLC	Escrow account title: Project Frontier Purchase Price Escrow Account Number: 953030407 Routing Number: 022000020 ABA Number: 021000088 SWIFT Code: MIMDUS33 HSBC Bank USA, NA 452 Fifth Ave New York, NY 10018 Callback Information: Jordyn Stadler (720.452.2309 or 303.815.4177) and Zelle Garrett (720.709.1204 or 802.355.1755)	\$ 350,000.00	Purchase Price Escrow Amount
JP Morgan Chase Bank, N.A.	Shareholder Representative Services LLC	Zions Bancorporation NA DBA Vectra Bank 2000 S. Colorado Blvd. Suite 2-1200 Denver CO 80222 Routing (ABA) Number: 102031514 Account Number: 5796610557 Account Title: Shareholder Representative Services LLC FBO 383 Clients SWIFT Code: ZFNBUS55 Callback Information: Tom Cipson - (720.391.7698) and Valerie Palmer (or Jim Davies) - (415.263.9035) Account Number: 3302834697	\$ 250,000.00	Expense Fund
JP Morgan Chase Bank, N.A.	TAPD, Inc.	Account Title: TAPD Inc. Bank Name: SL WF BK SJ Bank Address: 3003 Tasman Drive, Santa Clara, CA, 95054 ABA: 121140399 Callback Information: Mark Glaser (516.62.0459) and Charlie Hovick (616.575.9346) Silicon Valley Bank 3003 Tasman Drive Santa Clara, CA 95054 ABA Routing No. 321140399	\$ 21,305,015.51	For further distribution to employee option holders and employee Selling Expense recipients, as well as employer portion of payroll taxes
JP Morgan Chase Bank, N.A.	Silicon Valley Bank			

\$ 105,000.00 AMEX Card Indebtedness

Reconciling Items	\$ (779,019.96)	Cash Assortment
	\$ 105,000.00	AMEX Card Indebtedness
Total Difference		

GX2330; CJ2171

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

Berham Panthaki Testimony

P2Q5jav1

423

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,

5 v. 23 Cr. 251 (AKH)

6 CHARLIE JAVICE, OLIVIER AMAR,
7 Defendants. Jury Trial
8 -----X
9 New York, N.Y.
10 February 26, 2025
11 10:20 a.m.

12 Before:

13 HON. ALVIN K. HELLERSTEIN,
14 District Judge

APPEARANCES

15 MATTHEW PODOLSKY
16 Acting United States Attorney for the
17 Southern District of New York
18 BY: MICAH F. FERGENSON
19 RUSHMI BHASKARAN
20 GEORGIA V. KOSTOPOULOS
21 NICHOLAS W. CHUCHOLO
22 Assistant United States Attorneys

23 BAEZ LAW FIRM
24 Attorneys for Defendant Charlie Javice
25 BY: JOSE A. BAEZ

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Attorneys for Defendant Charlie Javice
BY: RONALD S. SULLIVAN, JR.

RICHARD M. DE MARIA
Attorney for Defendant Charlie Javice

QUINN EMANUEL URQUHART & SULLIVAN, LLP
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BY: CHRISTOPHER TAYBACK
ERICA FERDOMO

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

16 Q. Turning to the core system, where was that hosted when you
17 joined Frank?

18 A. So when I joined Frank, the core system was hosted on a
19 platform for Qualtrics. Qualtrics was a software service or a
20 service that Frank had purchased and had built the FAFSA form
21 on Qualtrics. When I joined, we decided that we wanted a more
22 safe and secure system and so Frank embarked on a project to
23 actually build our own core system.

24 Q. Was the core system ultimately migrated to a different
25 system?

1 A. Yes. So, we migrated off of Qualtrics, I would say,
2 sometime in 2018, November time frame, that's when we migrated
3 after of Qualtrics and onto the core system that Frank had
4 built.

5 Q. Where was the new core system hosted?

6 A. The new core system was hosted on Amazon Web Services, AWS.

The Contract

Axiom

ASL

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Data

LionTree

Government Case



Ryan MacDonald Testimony

2 Q. One of the things that you mentioned Chase did when it
3 first started working with Frank after the acquisition closed
4 in September was establishing some kind of a presence on the
5 Frank website, right?
6 A. Correct.
7 Q. Is it sometimes called a microsite?
8 A. A microsite, yes.
9 Q. And that's basically so someone could go on the Frank site
10 and then click on the Chase site?
11 A. That's right, go to a Chase app.
12 Q. And you mentioned the reason for that is because you knew
13 there might be people who are not filling out FAFSA that go to
14 the website, and you want to appeal to them as well?
15 A. Primarily, the way we were thinking about it was that if
16 they went to the site and filled out a form, that they would
17 see an ad.

Jennifer Zeitler Testimony

8 Now, as part of the -- I asked you a second ago about
9 integration. As far as the integration process with Frank and
10 Chase Bank, did there come a time when Chase Bank developed a
11 microsite for Frank?
12 A. Yes.
13 Q. What is a microsite?
14 A. It is like a small version, looks like your home page, but
15 it has a direct purpose to get people to sign up.
16 Q. And what is the direct purpose? You trailed off.
17 A. To get people to sign up. Sorry.
18 Q. So, is it within the Chase website?
19 A. Yes.

The Contract

Acxiom

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Data

LionTree

Government Case

P2Q5jav1

423

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----x

Behram Panthaki Testimony

11 A. There were errors in the way the system had been coded at
12 times and so there were adjustments for the system misfiring or
13 double-firing and other sort of discrepancies.

14 Q. When you say system, which system are you referring to?

15 A. Google Analytics.

24 ATTORNEYS FOR DEFENDANT CHARLIE JAVICE
25 BY: CHRISTOPHER TAYBACK
ERICA PERDOMO

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

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423

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
UNITED STATES OF AMERICA,

v.

23 Cr. 251 (AKH)

Behram Panthaki Testimony

25 A. So let me rephrase. The Iron Mountain flash drive was kept
1 in a safe deposit box at JPMorgan Chase. Data Baby was kept in
2 the safe and that's the laptop that had the information, and
3 the key to that was held by myself as well as Matt Glazer.

Attorney for Defendant Charlie Javice

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The Contract

Axiom

ASL

GX3.1.4

Data

LionTree

Government Case

Behram Panthaki Testimony

P2Q5jav1

423

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
UNITED STATES OF AMERICA,

v. 23 Cr. 251 (AKH)

CHARLIE JAVICE, OLIVIER AMAR,

Defendants. Jury Trial

New York, N.Y.
February 26, 2025
10:20 a.m.

Before:

HON. ALVIN K. HELLERSTEIN,

District Judge

APPEARANCES

MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York
BY: MICAH F. FERGUSON
RUSHMI BHASKARAN
GEORGIA V. KOSTOPOULOS
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BY: CHRISTOPHER TAYBACK
ERICA PERDOMO

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Q. You used the term "sanity check." I think on direct you said the sanity check was intended to make sure that the numbers sort of aligned. Do you recall that?

A. That is correct, yes.

Q. By "sort of" you mean that there is a bit of estimation going on here?

A. There were estimations, there were adjustments made for some historical anomalies which, you know, sort of brought to our notice -- Dave Glauber worked with, I believe at that time it was Olivier on those adjustments -- those adjustments happened historically before my time so I have no reason to sort of agree or disagree with that.

Q. My question is by "sort of" you mean it is not as simple as just a straight up mathematical calculation. This plus this equals this; correct?

A. Yes. That's why it is a sanity check or triangulation. It was not exact.

ORDER: ADD NEW EXHIBIT
FROM SARA – acxiom email
7/30

Lie Wims Morris Testimony

19 Q. Okay. When was the—was the deal review meeting—when was
20 the deal review meeting?

21 A. The deal review meeting was on July 30th.

22 Q. Okay. And so the questions that you discussed about
23 questions about data that came up in that meeting, were those
24 questions raised before or after the deal review deck was
25 prepared?

1 A. After.

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

P341JAV1

1024

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
UNITED STATES OF AMERICA,

v.

23 Cr. 251 (AKH)

Jennifer Wong Testimony

19 Q. Do you recall occasions where Ms. Javice in fact corrected
20 her understanding of the data you provided by saying that some
21 numbers looked higher than she would have expected?

BY: JOSE A. BAEZ

24 A. Yes.

ERICA PERDOMO
EOIN BEIRNE
KIRSTEN NELSON

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Email Campaign With ASL List Not Recommended

Case 1:23-cv-00251-AKH Document 381-5 Filed 04/25/25 Page 28 of 63

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

1024

F341JAV1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

v.

23 Cr. 251 (AKH)

CHARLIE JAVICE, OLIVIER AMAR,

-----X
Defendants.

Jury Trial

New York, N.Y.
March 4, 2025
10:00 a.m.

Before:

HON. ALVIN K. HELLERSTEIN,

District Judge

APPEARANCES

MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York

BY: MICAH F. FERGENSON
RUSHMI BHASKARAN
GEORGIA V. KOSTOPOULOS
NICHOLAS W. CHIUCHILO
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SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Jennifer Wong Testimony

9 Q. After discussing with Ms. Zeitler, did you discuss the
10 email campaign again with Mr. Amar?

11 A. Yes.

12 Q. And did you discuss Ms. Zeitler's views on the email
13 campaign, with Mr. Amar?

14 THE COURT: Did you tell Mr. Amar what Ms. Zeitler
15 said to you?

16 THE WITNESS: I don't remember reciting it exactly
17 about what her view was, but—

18 THE COURT: In substance.

19 THE WITNESS: In substance, we were worried about the
20 performance or the results of a marketing campaign.

21 BY MR. FERGENSON:

22 Q. And why were you worried about the performance or the
23 results?

24 A. Usually when we email users that have not signed up
25 for—have not given their emails to us, they're generally less
1 receptive to opening those emails.

The Contract

Acxiom

ASL

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Data

LionTree

Government Case

☐ 1440 W. Taylor Street, #402
Chicago, IL 60607

Quote + Purchase Order List Rental

Sales Contact:

Sales Email:

Contract Date:

Client Contact:

Contact:

Email:

Phone:

Account:

Mailing

Address:

City:

State:

ZIP:

Terms:

☐ 1440 W. Taylor Street, #402
Chicago, IL 60607

Quote + Purchase Order List Rental

Sales Contact: Donald Harger

Insertion Order Number: 1119586

Sales Email: dharger@exactdata.com

Client Order Number:

Contract Date: March 13, 2020

Delivery Date: March 20, 2020

Targeting Detail:

Payment Info:

Card number:

Cardholder Name:

By signing below the parties hereby agree to the Terms & Conditions on this Insertion

ExactData000001

USAO_00032123

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

Alex Sweeney Testimony

17 Q. But you actually testified that she did her own validation
18 exercise and sent you the results; right?

19 A. She sent us the results of her analysis, yes.

20 Q. Now, it doesn't say anything in this e-mail about her doing
21 any validation exercise; right?

22 A. No, it does not.

23 Q. It just says: See below. Happy to chat.

24 Right?

25 A. Yes.

The Contract

Axiom

ASL

GX3.1.4

Data

LionTree

Government Case

Alex Sweeney Testimony

P361JAV1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----x
4 UNITED STATES OF AMERICA,

5 v.

23 Cr. 251 (AKH)

6 CHARLIE JAVICE, OLIVIER AMAR,

7 Defendants.

Jury Trial

8 -----x

New York, N.Y.
March 6, 2025
10:20 a.m.

9 Before:

HON. ALVIN K. HELLERSTEIN,

District Judge

12 APPEARANCES

13 MATTHEW PODOLSKY
14 Acting United States Attorney for the
15 Southern District of New York
16 BY: MICAH F. FERGUSON
17 RUSHMI BHASKARAN
18 GEORGIA V. KOSTOPOULOS
19 NICHOLAS W. CHIUCHIOLLO
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KIRSTEN NELSON

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

13 Q. Sir, do you know what attribute data is?

14 A. I have an understanding, yes.

15 Q. And that basically means it is information that describes
16 certain characteristics of an individual; correct?

17 A. That was not my understanding, no.

18 Q. You understand if a person is a student, that's an
19 attribute?

20 A. I don't know.

21 Q. A person's gender is an attribute? Do you know that?

22 A. I don't know.

23 Q. Do you know a person's race is an attribute?

24 A. I don't know.

Contradictions

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

Alex Sweeney Testimony

P361JAV1

1388

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----x
UNITED STATES OF AMERICA,

v.

23 Cr. 251 (AKH)

CHARLIE JAVICE, OLIVIER AMAR,

Defendants.

Jury Trial

New York, N.Y.
March 6, 2025
10:20 a.m.

Before:

HON. ALVIN K. HELLERSTEIN,

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SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

5 Q. And why did you include that request?

6 A. Because we wanted to ensure the customers were actually
7 real, the data was real, again, to have a sufficient level of
8 validation that the customers actually existed.

11 Did you ask Acxiom to verify that the 4.25 million are
12 living humans in the flesh?

13 A. No.

14 Q. Why not?

15 A. We took what Charlie had shared as everybody was a real
16 customer, they were—it was a real person for every account
17 that existed. We were trusting her at that, and then verifying
18 that the information that they came with, one, added up to
19 4.25 million customers, and also included the large amount of
20 data that she had said she—that the product had for each
21 customer.

The Contract

Acxiom

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GX3.1.4

Data

LionTree

Government Case

2614

P315jav1

UNITED STATES DISTRICT COURT

Michael Salve Testimony

2 A. The last row identified as being populated in CJ 2177 is

3 row 149,115.

4 Q. Are there 4 million rows in this spreadsheet?

5 A. Not that I see, no.

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SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

The Contract

Axiom

ASL

GX3.1.4

Data

LionTree

Government Case

Message

From: Charlie Javice [charlie@withfrank.org]
Sent: 8/1/2021 3:25:07 PM
To: Marc Rowan [rowan@apollo.com]; Michael Eisenberg [me@aleph.vc]
Subject: [External] Fwd: Finland Data Request

See below.

Charlie Javice

From: Wims Morris, Leslie <leslie.wimsmorris@chase.com>
Sent: Sunday, August 1, 2021 3:12:26 PM
To: 'Charlie Javice' <charlie@withfrank.org>
Subject: Finland Data Request

Charlie,

As we discussed, we have two critical confirmatory due diligence requests related to the transaction:

1. **Data Variable Validation** – we need to understand the number of data attributes and questions and table noted below; and
2. **Data Match with Chase Customers** – we need to understand the Finland customers. More specifically a) whether Finland customers have an existing customers are also Chase customers we will identify what specific products stage this is for data insights purposes only.

In both cases, we would like to work with Axiom – a Company that we have an existing above mentioned analyses. We recommend that we start the planning process ASAP analyses entail and include our respective legal teams so everyone is clear regarding options that work for you and your team tomorrow and we will plan accordingly. As fast track this work ahead of signing.

Data Variable Validation Request Details

How many customer accounts have 100% of the below data?

How many customer accounts have partial information? Of partial records, what % Validate the integrity of each of the variables to the degree reasonable (e.g., data in appropriate formats)

Section	Variable
Popup	STUDENT_FIRST_NAME
	STUDENT_LAST_NAME
	STUDENT_EMAIL
	STUDENT_PHONE_NUM
Personal	STUDENT_HOME_ADDR
	STUDENT_HOME_ADDR_APT
	STUDENT_BIRTHDAY

FOIA Confidential Treatment Requested
 CONFIDENTIAL
 CONFIDENTIAL

CJ-0249.0001

FRANK1SDNY00000386
 USAO_Rei_000005814

DEFENDANT'S
 EXHIBIT
 CJ 249
 S1 23 Cr. 251 (AKH)

Message

From: Charlie Javice [charlie@withfrank.org]
Sent: 8/1/2021 3:25:07 PM
To: Marc Rowan [rowan@apollo.com]; Michael Eisenberg [me@aleph.vc]
Subject: [External] Fwd: Finland Data Request

See below.

Charlie Javice

From: Wims Morris, Leslie <leslie.wimsmorris@chase.com>
Sent: Sunday, August 1, 2021 3:12:26 PM
To: 'Charlie Javice' <charlie@withfrank.org>
Subject: Finland Data Request

DEFENDANT'S
 EXHIBIT
 CJ 249
 S1 23 Cr. 251 (AKH)

P3K5jav1

2920

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jenny Zeitler Testimony

12 Q. And how frequent were your interactions with Ms. Javice?

13 A. I think I talked to her about three or four times. It
14 wasn't—it wasn't too often.

15 THE COURT: A week, a day, month?

16 THE WITNESS: Total.

BY: CHRISTOPHER TAYBACK
ERICA PERDOMO

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

P3K5jav1

2920

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,

Jenny Zeitler Testimony

12 A. A marketable user is someone you can market to.

13 Q. And in the context of retargeting, are people who visited
14 the website, what we have been calling users, are they
15 marketable users?

16 A. Yes. If they've accepted the cookies.

24 BY: CHRISTOPHER TAYBACK
25 ERICA PERDOMO

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

Jenny Zeitler Testimony

9 You remember the back and forth you and the Judge had
10 about whether you opt-in or opt-out of cookies? As you recall,
11 back in the summer of 2021 was that opt-out of cookies policy
12 available then? We all know we see it now but back in
13 August -- July, August 2021?

14 A. I don't believe so.

15 Q. That would mean then that all 4.25 million Frank users were
16 automatically opted in?

17 A. Yes.

P3K5jav1

2920

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,
5
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25

Jenny Zeitler Testimony

7 A. Because they're not asking for the e-mail.

8 So, if you send a lot of e-mails like that, popularly
9 known as spam, then your sender score goes down and then less
10 e-mails get out or to get to the intended people that actually
11 want your e-mails.

BY: CHRISTOPHER TAYBACK
ERICA PERDOMO

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

Jennifer Zeitler Testimony

24 THE COURT: Tell us, with whom did you have this
25 discussion?

1 THE WITNESS: Jen Wong.

APPEARANCES

7 THE WITNESS: Okay. I told her it was bad email
8 practice to buy lists and send it out to people who weren't
9 expecting it, that we just stick with the list of people that
10 we got organically, that actually opted into our emails.

Deal Review Minutes

Separate into
callouts, animated

m

ASL

GX3.1.4

Data

LionTree

Government Case

Items Reviewed and Forum Decision:

Project Finland – Reviewed and confirmed no objections to signing
Any review required?

190

Anti-trust review required?

190

Key Items Discussed:

- The deal team shared that since the last Project Finland Deal Review meeting we have completed confirmatory due diligence, continued to negotiate the merger agreement and are near pen-down. Charlie's employment agreement is still being negotiated but hoping to wrap-up today. Integration planning has started and will pick up in earnest next week. We think negotiations have landed in a favorable place. We are aiming to sign the agreement no later than end of next week. To do so we will need to finalize the negotiation of the merger agreement and have signed employment agreements from Charlie and 75% of employees.
- The deal construct remains a walk away structure meaning there are no contractual remedies against security holders after closing. We negotiated indemnity escrow coverage for matters such as pre-closing taxes if there are any and coverage if there are any transaction expenses or debt that isn't clean at closing. We negotiated for the majority of sellers to sign support agreements where they stand behind fraud. We significantly expanded the reps and warranties and expanded the interim operating governance between sign and close. The original agreement had hell or high water covenant and we were able to flip that standard to essentially say we have the opposite. The rep and warranty insurance will be bound at signing. We negotiated an inside date of 40 days from sign to close. Charlie is keen to close as soon as possible.
- The group discussed that Finland will require a reprioritization of the book of work for consumer and the engagement platform. It was emphasized that this is an incremental strategy for student, not an asset, and we will be uplifting with our current resources. We are in agreement that we are committed to this strategy and will put the resources behind it. Work will be done next week to determine what the trade-offs are for the minimum amount of work in order to bring Finland in and then park it for at least six months. It is understood that there will be an impact to some high priority things. It was suggested to ensure that we are maximizing on contractors and MSAs where possible to augment this work.
- The group asked if there is a process for notice to regulators. Advance notice is not required but all agreed that we should have courtesy conversations regarding both Finland and Impulse.
- The deal team shared that our exclusivity period expires on August 7th. We are aiming to be officially pen-down within the next 48 hours.
- Follow-up items:
 - Allison and Rohan to put together proposal of what will be reprioritized for the minimum diversion of resources for this to run standalone in the short-term until resources can be permanently allocated.
 - Peter to coordinate heads-up to regulators next week regarding Finland and Impulse.

From: Katz, David (david.katz@pmorgan.com)
Sent: 7/31/2023 12:53:57 PM
To: Wims Morris, Leslie (leslie.wimsmorris@chase.com); Jennifer Robert (jennifer.robert@chase.com); Muel (muel.v.dooden@chase.com); Seltzer, Adam (adam.seltzer@chase.com); Severe (severe.carmody@chase.com); Beer, Allison (allison.beer@chase.com); Simon, Scott (scott.simon@chase.com); Brucker, Matt (matt.brucker@chase.com); Kave (kave.jordan@chase.com); Ramo, Ari (ari.ramo@chase.com); Williams (jerry.williams@chase.com); Schmitt, Jordan (jordan.schmitt@chase.com); Ashworth, Ali (ali.ashworth@chase.com); Peppas, Is (isabella.peppas@chase.com);
Subject: Deal Review - Finland - Materials attached
Attachments: 20210730_CCB Deal Review Forum Minutes

Please find attached the minutes from yesterday's Deal Review meeting.
Thanks,
David

-----Original Appointment-----
From: Wims Morris, Leslie (CCB, USA) (leslie.wimsmorris@chase.com)
Sent: Wednesday, July 26, 2023 7:31 AM
To: Wims Morris, Leslie (CCB, USA); Lake, Marianne; Rodriguez, Steve W (CCB, USA); Seltzer, Adam B (CCB, USA); Carmody, Brian J (Legal, USA); Beer, Allison (CCB, USA); Burger, Corinne M (Compliance, USA); Ramo, Andre R (CCB, USA); Nelson, Peter J (Compliance, USA); Kave, Jordan (CCB, USA); Norton, Cathy T (CCB, USA); Schmitt, Jordan (CCB, USA); Benney, Brian A; Peppas, Jennifer A; Katz, David
Subject: Deal Review - Finland - Materials attached
When: Friday, July 30, 2023 12:00 PM-12:30 PM (UTC-04)
Where: Zoom Meeting ID: 949 810 4665

When: Friday, July 30, 2023 12:00 PM-12:30 PM (UTC-04)
Where: Zoom Meeting ID: 949 810 4665

Note: The GMT offset above does not reflect daylight savings time.

Join using Zoom for my meetings.

Meeting ID: 9498104665

Join from PC, Mac, iOS or Android: <https://zoom.us/j/9498104665>

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Data

LionTree

Government Case

Project Finland Description:

- Frank (Finland) is a service that helps students locate and apply for financial aid, through a unique content and technology platform
- Finland is currently in a sale process, led by LionTree and Chase has submitted a non-binding bid to acquire the company
- Finland would become a key piece of our student strategy, and would provide us with content and capabilities to create compelling study journeys and ease onboarding to Chase student -focused products across Consumer Bank, Lending and USWM
- We have completed diligence, and all work streams are in a position to proceed. We are seeking approval to sign a merger agreement to acquire the company, targeting signing week of 8/2

Key considerations and risks

Business

- Existing Finland products/partnerships evaluated to understand implications and ability to keep them running. Pricing structures (e.g., membership subscription plans) will be revised to fit Chase's strategy.
- Chase usability of customer data has been validated, exception: use by 3rd parties
- Company has taken a PPP loan from JPMC that will require pay back prior to consummating an acquisition
- Finland's access to FAFSA form filling being shut off by the government is a risk from a customer funnel standpoint

Project Finland
July 2021

Lead Contact:
Ryan MacDonald
/ Steve Goodman

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Data

LionTree

Government Case

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: [REDACTED]

Possible [REDACTED]

Charlie [REDACTED]

Charlie [REDACTED]

From: Sweeney, Alex

Sent: Monday, August 2, 2021 6:40:59 PM

To: 'Charlie Javice' <charlie@withfrank.org>; Goodman, Steve W <steve.w.goodman@chase.com>

Subject: RE: Data validation requirements

Hey Charlie,

We've had

Do you have

Let me know

From: Chase

Sent: Monday, August 02, 2021 7:36 PM

To: Sweeney, Alex (CCB, USA) <alex.sweeney@chase.com>; Goodman, Steve W (CCB, USA) <steve.w.goodman@chase.com>

Subject: Re: Data validation requirements

I did! I think

Charlie [REDACTED]

Charlie Javice [REDACTED]

From: Sweeney, Alex

Sent: Monday, August 02, 2021 7:36 PM

To: Sweeney, Alex (CCB, USA) <alex.sweeney@chase.com>; Goodman, Steve W (CCB, USA) <steve.w.goodman@chase.com>

Subject: Re: Data validation requirements

Below is what

Also – did you

want to make

STUDEN

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From: Sweeney, Alex <alex.sweeney@chase.com>

Sent: Monday, August 2, 2021 6:40:59 PM

To: 'Charlie Javice' <charlie@withfrank.org>; Goodman, Steve W <steve.w.goodman@chase.com>

Subject: RE: Data validation requirements

Below is what we discussed on during our call – I've sent around and waiting on feedback so **not** yet final.

Also – did you see docs come thru from Matt at Acxiom? He's told me he sent them over for your Legal's review but want to make sure you got them.

From: Charlie Javice <charlie@withfrank.org>

Sent: Monday, August 02, 2021 7:36 PM

To: Sweeney, Alex (CCB, USA) <alex.sweeney@chase.com>; Goodman, Steve W (CCB, USA) <steve.w.goodman@chase.com>

Subject: Re: Data validation requirements

Subject: Re: Data validation requirements

I did! I think lawyers are on it and will revert back with comments .

Legal Terms During Synthetic

The Contract

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Data

LionTree

Government Case

From:
on behalf of
Sent:
To:
Subject:

From: Charlie Javice [charlie@withfrank.org]
on behalf of Charlie Javice <charlie@withfrank.org> [charlie@withfrank.org]
Sent: 8/4/2021 10:48:11 PM
To: Sweeney, Alex [alex.sweeney@chase.com]
Subject: Re: Draft Internal data counts

Hey Alex,

Per my discussion with Leslie, please refer to the data room document 3.1.4 on user breakdown. The data provided for the analysis is coming from FAFSA in progress point of entry. Other products are not included in the scope of this analysis as confirmed OK with Leslie just now. Leslie requested I follow up via email with this information.

Will be wrapping up the next couple hours for axscium (on with lawyers for the leslie workflow at 7pm so may be slightly delayed).

Charlie

Hey Alex

Per my
provided
the scop
this info

Will be
be slight

Charlie

On Wed
I stoppe
everyon
Charlie

Charlie
9/4/21

From: S
Sent: W
To: Cha
Subject:

Questio

From:
Sent: V
To: W
Cc: alex.s
Subject:

See bel

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Got Clearance From Board & Good For Marketing

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LionTree

Government Case

From: Olivier Amar <olivier@withfrank.org>

Sent: Monday, August 2, 2021 6:22:06 PM

To: Charlie Javice [REDACTED]

Subject: Re: List Count Report for 1201 Charlie Frank Revised-1201 ACC 08/02/21

Would love this for Marketing Automation to boost our lists to market scholarships and class finder.

Nice!

From:

Charlie Javice [REDACTED]

on behalf of

Charlie Javice [REDACTED]

Sent:

8/2/2021 10:30:13 PM

To:

Olivier Amar [olivier@withfrank.org]

Subject:

Re: List Count Report for 1201 Charlie Frank Revised-1201 ACC 08/02/21

I'm on it!! Let me get board approval and will be awesome

Leslie Wims Morris Testimony

17 Q. And during—after you sent this initial email what, if
18 anything, did Ms. Javice request that you do?

19 A. She requested that I summarize our conversation in writing
20 for clarity on our rationale for why we needed it and our
21 stance that it was a condition to closing the transaction, and
22 so her request was that I do that such that she could also
23 share our point of view with her board of directors.

Get Clearance From Board

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Data

LionTree

Government Case

August 2-3, 2021

Timestamp	Sender	Message
8/2/2021 10:05:06 PM(UTC+0)	whatsapp.net Olivier Amar	speak to ASL
8/2/2021 10:05:10 PM(UTC+0)	whatsapp.net Olivier Amar	call me when you get a minute
8/2/2021 10:58:50 PM(UTC+0)	whatsapp.net Olivier Amar	Callin asked us to fill in the X: Frank is working with a number of schools to promote your FAPA. Exempted. Both as a falling point to interpret I told her we work with tons of schools but that most are under NDA.
8/2/2021 10:59:29 PM(UTC+0)	whatsapp.net Olivier Amar	
8/2/2021 11:35:00 PM(UTC+0)	whatsapp.net Charlie Javice	Great, Thanks for handling
8/2/2021 11:36:34 PM(UTC+0)	whatsapp.net Olivier Amar	Yeah, but how many schools should I tell her she can quote?
8/2/2021 11:37:04 PM(UTC+0)	whatsapp.net Charlie Javice	Whatever u want
8/2/2021 11:40:32 PM(UTC+0)	whatsapp.net Olivier Amar	K
8/3/2021 12:46:57 PM(UTC+0)	whatsapp.net Charlie Javice	Where are we with ASL?
8/3/2021 12:46:25 PM(UTC+0)	whatsapp.net Charlie Javice	Michael signed off

SCREENSHOT
TAKEN
BY A
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CASE

August 2-3, 2021

Timestamp	Sender	Message
8/3/2021 12:46:57 PM(UTC+0)	s.whatsapp.net Charlie Javice	Where are we with ASL?
8/3/2021 12:46:25 PM(UTC+0)	s.whatsapp.net Charlie Javice	Michael signed off

AUGUST 3, 2021

Timestamp	Sender	Message
8/3/2021 4:06:51 PM(UTC+0)	whatsapp.net Charlie Javice	re credit card
8/3/2021 4:06:59 PM(UTC+0)	whatsapp.net Charlie Javice	she said over the phone
8/3/2021 4:07:00 PM(UTC+0)	whatsapp.net Charlie Javice	go
8/3/2021 4:07:18 PM(UTC+0)	whatsapp.net Olivier Amar	Exempt through PayPal
8/3/2021 4:07:19 PM(UTC+0)	whatsapp.net Olivier Amar	It's do it now
8/3/2021 4:07:54 PM(UTC+0)	whatsapp.net Olivier Amar	which email do you want me to use for the account? The original P2 had your email
8/3/2021 4:11:27 PM(UTC+0)	whatsapp.net Charlie Javice	I want it through a card
8/3/2021 4:11:36 PM(UTC+0)	whatsapp.net Olivier Amar	It will be the card
8/3/2021 4:11:48 PM(UTC+0)	whatsapp.net Charlie Javice	I need the data today
8/3/2021 4:11:47 PM(UTC+0)	whatsapp.net Olivier Amar	but I need to confirm the email

SCREENSHOT
TAKEN
BY A
GOVERNMENT
CASE

August 3, 2021

Timestamp	Sender	Message
8/3/2021 4:22:50 PM(UTC+0)	s.whatsapp.net Charlie Javice	On with Michael and [another] and they both said buy it and move quick
8/3/2021 4:34:39 PM(UTC+0)	s.whatsapp.net Olivier Amar	I have the 3m at 5 cents
8/3/2021 4:34:53 PM(UTC+0)	s.whatsapp.net Olivier Amar	so 150K
8/3/2021 4:35:04 PM(UTC+0)	s.whatsapp.net Charlie Javice	Do it

GX801-06; GX801-09

JPMC Promises Not Kept & Charlie Javice's Data Strategy

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The Contract

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Data

LionTree

Government Case

From: Macdonald, Ryan S (CCB, USA) [mailto:RYAN.S.MACDONALD@JP.MORGAN.CHASE.COM]
Sent: 1/11/2022 1:47:10 PM
To: Javice, Charlie (CCB, USA) [mailto:charlie.javice@chase.com]; Reichert, Kelley A (CCB, USA) [mailto:kelly.a.reichert@jpmchase.com]

Frank Data Strategy:

From: Javice, Charlie (CCB, USA) [mailto:charlie.javice@chase.com]
Sent: Monday, January 10, 2022 8:09:10 PM
To: Macdonald, Ryan S (CCB, USA) [mailto:RYAN.S.MACDONALD@JP.MORGAN.CHASE.COM]; Reichert, Kelley A (CCB, USA) [mailto:kelly.a.reichert@jpmchase.com]
Cc: Hansen, Lorraine C (FEB, USA) [mailto:LORRAINE.C.HANSEN@JP.MORGAN.CHASE.COM]; Bondi, Jane D (FEB, USA) [mailto:JANE.D.BONDI@JP.MORGAN.CHASE.COM]; Traubman, Jameson (CCB, USA) [mailto:JAMESON.TRAUBMAN@JP.MORGAN.CHASE.COM]; Contri, Logan M (CCB, USA) [mailto:LOGAN.M.CONTRI@JP.MORGAN.CHASE.COM]; Campanelli, Marcia D (CCB, USA) [mailto:MARCIA.D.CAMPANELLI@JP.MORGAN.CHASE.COM]; Seidemann, Neil (CCB, USA) [mailto:NEIL.SEIDEMANN@JP.MORGAN.CHASE.COM]; Granada, Matt (CCB, USA) [mailto:MATT.GRANADA@JP.MORGAN.CHASE.COM]; Adelsberg, Jay (CCB, USA) [mailto:JAY.ADELSBERG@JP.MORGAN.CHASE.COM]; Divilek, Sorail (CCB, USA) [mailto:SORAIL.DIVILEK@JP.MORGAN.CHASE.COM]
Subject: RE: Following up with marketing assumptions

Thanks Ryan!

Question 1: I do not think partners take issue but they do want to be clearly informed with key strategic decisions so they can evaluate the risk accordingly. That said, I do not think a "quit and switch" of selling students financial aid help with Frank, and then marketing Chase financial products will work. This is why we developed an integrated Chase student strategy which I do think works for everyone and puts students first.

Will try the best I can over email recap below.

On 1, we cannot test a "bad" ad experience with partner channels, the model is that colleges and SIM are currently paying us to use our Frank service. If we monetize on top of that without informing them or offering them anything, I would be really surprised that they continue to send us traffic. The premium / free works if you are charging a student something or an institution a large amount and you tell them you are waving or highly discounting the fee to not get ads. We would need to ask the partner their appetite for fundamental viable change to the student experience they have on their college app. Chase contractually can use the data (hence integrated approach and no ads recommendation). Please note and all can terminate other than SIM at no cost.

For more context on what colleges expect for a "bad" experience with ads for checking accounts and price, the benchmark is I'm sure you've seen the college RFPs, colleges partner with one select checking account partner and charge \$50-\$100 a student on enrollment size. This is why we believe an integrated approach would work and have socialized so we don't need to pay a college. We could make the product free powered by Chase or whatever brand we decide while sharing the data with Chase. Ads get complicated given the traditional referral bonus and happy to share

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USAO_Rel_00002141

Frank Data Strategy:

- 1. Local Search:** Frank can leverage Chase physical branch locations to win the local financial aid search and top page search ranking driving millions more families to Frank/Chase digital assets. Frank will now have a "location" in every community and campus.
- 2. Remarketing & Audience Building:** Frank can segment data to target any new customer segments at a micro level. From zipcodes to degree types to specific colleges and families who are homeowners. Frank can build audiences which will lower the cost of acquiring Chase customers by up to 60% in the next 18 months.
- 3. Content Marketing & SEO:** Frank will supercharge content and create content at a level that outpaces nerdwallet and the government combined with 500-1,000 pieces of video, guides, articles and posts a month to be located on both Chase and Frank. With the site authority of both entities, Frank will outrank both nerdwallet, credit karma and bankrate for financial content within 18-24 months.
- 4. Increase Account Openings:** Frank's products appeal to high school and college students. From FAFSA, Frank users can automatically open checking and card accounts by opt-in of financial disclosures. This eliminates major application drop offs and opens a new channel to market to.
- 5. Targeted Product Recommendations:** Frank can pre-qualify customers based on FAFSA data to show relevant products by segment optimizing product conversation and approval rates

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USAO_Rel_000239671

Feb. 11, 2022 Slack Numbers

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LionTree

Government Case

Short Message Report

Conversations: 1 Participants: 1
Total Messages: 73 Date Range:

Outline of Conversations

mpdm-charlie-oliver-jen.wong-1 - 2022/02/11 - 73 messages
<charlie@tapd.us> • Jen Wong <jen.wong@withfrank.org> • Oliver

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C Charlie Javice <charlie@tapd.us> 2/11/2022, 10:31 PM
also...how did we get to 7.7?

C Charlie Javice <charlie@tapd.us> 2/11/2022, 10:31 PM
when we added 1.35 in 2021

C Charlie Javice <charlie@tapd.us> 2/11/2022, 10:31 PM
something is off

C Charlie Javice <charlie@tapd.us> 2/11/2022, 10:32 PM
i asked oliver for that number

C Charlie Javice <charlie@tapd.us> 2/11/2022, 10:32 PM
these numbers just look way higher

C Charlie Javice <charlie@tapd.us> 2/11/2022, 10:44 PM
Anyways - u figured out the disconnect so thanks

GOVERNMENT
EXHIBIT

C Charlie Javice <charlie@tapd.us> 2/11/2022, 11:46 PM
Perfect - the other discrepancy is the double counting which we took care of

C Charlie Javice <charlie@tapd.us> 2/11/2022, 11:46 PM
This matches

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Government Case



For the Period Ending 12/31/21, see 2022/23

Private Client Savings

Savings Account Summary

Beginning Balance	0.00	Amount Owed to Your Business (Not Owed)	0.00%
Deposits & Credits	18,335,700.54	Interest Paid This Period	\$100.00
Payments & Transfers	(2,077,844.50)	Interest Paid Year-to-Date	\$100.00
Ending Balance	\$15,257,856.04		

Student Agency 2014. Service is a trademark service. Effects the relationship between the owners of Service, mostly earned in the process of this, business period and also through that. Service is all, except for the time period.

Transaction Detail

[illegible]

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JPMorgan

Table 1

JPMC's Pretextual Summer 2022 Email Blast/Campaign

P3K5jav1 2920

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
2 -----X
3 UNITED STATES OF AMERICA,
4 v. 23 Cr. 251 (AKH)
5 CHARLIE JAVICE, OLIVIER AMAR,
6 Defendants. Jury Trial
7 -----X
8 New York, N.Y.
March 20, 2025
10:15 a.m.
9 Before:
10 HON. ALVIN K. HELLERSTEIN,
District Judge
11
12 APPEARANCES
13 MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York
14 BY: MICAH F. FERGENSON
RUSHMI BHASKARAN
15 GEORGIA V. KOSTOPOULOS
NICHOLAS W. CHIUCHILO
16 Assistant United States Attorneys
17 BAEZ LAW FIRM
18 Attorneys for Defendant Charlie Javice
BY: JOSE A. BAEZ
19 RONALD SULLIVAN LAW PLLC
20 Attorneys for Defendant Charlie Javice
BY: RONALD S. SULLIVAN, JR.
21 RICHARD M. DE MARIA
22 Attorney for Defendant Charlie Javice
23 QUINN EMANUEL URQUHART & SULLIVAN, LLP
24 Attorneys for Defendant Charlie Javice
BY: CHRISTOPHER TAYBACK
ERICA PERDOMO
25

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Jennifer Zeitler Testimony

17 Q. Now, the e-mail blast, did it have Frank anywhere on the

18 e-mail blast?

19 A. It didn't.

20 Q. So these were people receiving cold e-mails from JPMorgan

21 Chase only?

22 A. Yes.

9 Q. And the content of the email was selling Chase products,

10 right?

11 A. Correct.

12 Q. Now you'd expect higher rates around the board if you had

13 sent it from your Frank email list, correct?

14 A. Yes.

16 THE COURT: Why do you say that?

17 THE WITNESS: Because they had opted into our emails.

18 They would have expected to see something from us.

Calendars Of The Acquisition

JULY 2021  	AUGUST 2021  	SEPTEMBER 2021	OCTOBER 2021	NOVEMBER 2021
DECEMBER 2021	JANUARY 2022	FEBRUARY 2022	MARCH 2022	APRIL 2022
MAY 2022 	JUNE 2022   	JULY 2022   	AUGUST 2022	SEPTEMBER 2022   

Charlie Demanded Accuracy

423

P2Q5jav1

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
2 -----X
3 UNITED STATES OF AMERICA,
4 v. 23 Cr. 251 (AKH)
5 CHARLIE JAVICE, OLIVIER AMAR,
6 Defendants. Jury Trial
7 -----X
8 New York, N.Y.
February 26, 2025
10:20 a.m.
9 Before:
10 HON. ALVIN K. HELLERSTEIN,
District Judge
11
12 APPEARANCES
13 MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York
14 BY: MICAH F. FERGENSON
RUSHMI BHASKARAN
15 GEORGIA V. KOSTOPOULOS
NICHOLAS W. CHIUHILO
16 Assistant United States Attorneys
17
18 BAEZ LAW FIRM
Attorneys for Defendant Charlie Javice
19 BY: JOSE A. BAEZ
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Attorneys for Defendant Charlie Javice
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22 RICHARD M. DE MARIA
Attorney for Defendant Charlie Javice
23
24 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Attorneys for Defendant Charlie Javice
25 BY: CHRISTOPHER TAYBACK
ERICA PERDOMO

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Berham Panthaki Testimony

- 2 Q. You had testified that there were discussions with
3 Ms. Javice and Mr. Amar about this overreporting?
4 A. That is correct.
5 Q. What was Ms. Javice's reaction to this?
6 A. You know, Charlie, Ms. Javice agreed that we have to be
7 more accurate about the numbers. You know, there was a
8 conversation had around ensuring that we sort of created the
9 processes to accurately report. You know, Charlie was --
- 12 Q. How about Mr. Amar? Did you discuss the spreadsheet with
13 Mr. Amar?
14 A. Yes, we did. Olivier sort of defended the sort of error,
15 he mentioned that we were using a free version of Google
16 Analytics, and as such he was trying to save money, and that
17 he's why some of these errors occurred.

Frank's Data Was Scattered In Multiple Places

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The Contract

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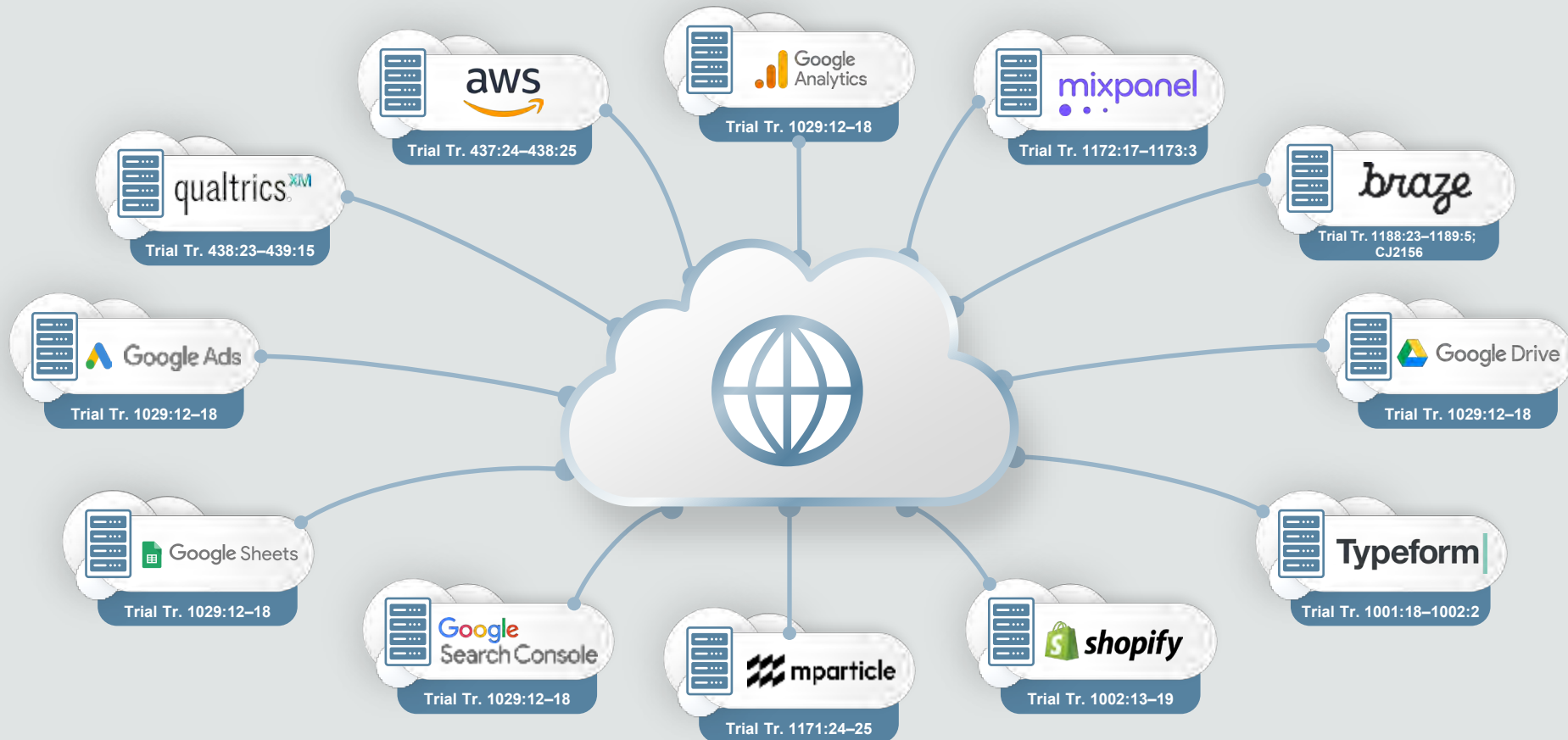
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Data

LionTree

Government Case



“Basic Diligence” Is All It Takes To Identify Synthetic Data

Dr. Adam Kapelner Testimony

P3C5jav1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,

5 v.

6 CHARLIE JAVICE, OLIVIER AMAR,
7 Defendants.
8 -----X

9 Before:

10 HON. ALVIN K. HELLER

11 APPEARANCES:

12 MATTHEW PODOLSKY
13 Acting United States Attorney for
14 Southern District of New York
15 BY: MICAH F. FERGENSON
16 RUSHMI BHASKARAN
17 GEORGIA V. KOSTOPOULOS
18 NICHOLAS W. CHIUHILO
19 Assistant United States Attorney

20 BAEZ LAW FIRM
21 Attorneys for Defendant Charlie
22 BY: JOSE A. BAEZ

23 RONALD SULLIVAN LAW PLLC
24 Attorneys for Defendant Charlie
25 BY: RONALD S. SULLIVAN, JR.

26 RICHARD M. DE MARIA
27 Attorney for Defendant Charlie

28 QUINN EMANUEL URQUHART & SULLIVAN, LLP
29 Attorneys for Defendant Charlie
30 BY: CHRISTOPHER TAYBACK
31 ERICA PERDOMO

32 SOUTHERN DISTRICT REPORTER
33 (212) 805-0000

12 Q. When you met with the government, one of the things you
13 told them was that, in your mind, it would be obvious that data
14 was synthetic?

15 A. I would say it was obvious that it did not correspond to
16 any real person.

17 THE COURT: How obvious? Why would it be obvious?
18 You wanted to change the similarity of geographical locations
19 between high school and colleges because someone who looked at
20 that and saw the confluences would say, hey, this is not real.

21 THE WITNESS: Yeah. I'll correct my statement. Look
22 obvious if you did some basic diligence on the rows.

The Contract

Axiom

ASL

GX3.1.4

Data

LionTree

Government Case

From: Denise Lyn <IMCEAEX-
_O=EXCHANGE;LABS_OU=EXCHANGE;F120ADMINISTRATIVE;GROUP=26128FYDIBOHF23SPDLT;_CN=RECEIPTS_CN=D85A29A6E37742A3AAAI261ACTB0898A-
DLYN@nanprd15prod.outlook.com>
Sent: Mon 8/2/2021 3:31:28 PM Coordinated Universal Time
To: Steve Stoll <sstoll@casmarketing.com>
Subject: With Frank org- College Market

I just got off the phone w/
https://withfrank.org/
He has a house file that he wants to append (augment data to). The second part is postal mailing.
He is looking for 103M records and would like a call.
Are you available today for a call?

Denise Lyn
Sales Manager
IMCEA
Cas Marketing
1000
Farmington, NY 11731
(845) 342-0012
E: dlyn@casmarketing.com
www.casmarketing.com

-----Original Message-----
From: Steve Stoll
Sent: Monday, August 2, 2021 3:31 PM
Subject: With Frank org- College Market
One more, this one says
Thank Denise

Steve Stoll
Executive Vice President
IMCEA
Cas Marketing
1000
Farmington, NY 11731
(845) 342-0012
E: sstoll@casmarketing.com
www.casmarketing.com

-----Original Message-----
From: Denise Lyn
Sent: Monday, August 2, 2021 3:31 PM
Subject: With Frank org- College Market
CONFIDENTIAL - This email and
any content from ASL, M,
Reporting Representative
Email: steven.stoll@casmarketing.com
Phone: 845-342-0012
Mobile: 845-342-0012
Please contact to request
Change

From: Denise Lyn
Sent: Monday, August 2, 2021 3:31 PM
Subject: With Frank org- College Market
CONFIDENTIAL - This email and
any content from ASL, M,
Reporting Representative
Email: steven.stoll@casmarketing.com
Phone: 845-342-0012
Mobile: 845-342-0012
Please contact to request
Change

From: Denise Lyn<IMCEAEX-
_O=EXCHANGE;LABS_OU=EXCHANGE;F120ADMINISTRATIVE;GROUP=26128FYDIBOHF23SPDLT;_CN=RECEIPTS_CN=D85A29A6E37742A3AAAI261ACTB0898A-
DLYN@nanprd15prod.outlook.com>
Sent: Mon 8/2/2021 3:31:28 PM Coordinated Universal Time
To: Steve Stoll <sstoll@casmarketing.com>
Sent on behalf of: Denise Lyn <IMCEAEX-
_O=EXCHANGE;LABS_OU=EXCHANGE;F120ADMINISTRATIVE;GROUP=26128FYDIBOHF23SPDLT;_CN=RECEIPTS_CN=D85A29A6E37742A3AAAI261ACTB0898A-
DLYN@nanprd15prod.outlook.com>
Subject: With Frank org- College Market

I just got off the phone with the prospect, he is in the college market

https://withfrank.org/

He has a house file that he wants to append (augment data to). The second part is postal mailing.

He is looking for 103M records and would like a call.

He is looking to move very "quickly" on this and would like a call today.

Are you available today for a call?

Confidential
CONFIDENTIAL

ASL_00000002
USAO_Ret_000388305

The Contract

Acxiom

ASL

GX3.1.4

Data

LionTree

Government Case

P3H1JAV1

2349

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----X
4 UNITED STATES OF AMERICA,

5 v. 23 Cr. 251 (AKH)

Ryan MacDonald Testimony

19 Q. Now, in terms of this email campaign, to go back to this
20 one, the two emails that are depicted here, they don't mention
21 Frank, do they?
22 A. They don't.

22 ATTORNEY FOR DEFENDANT
23 QUINN EMANUEL URQUHART & SULLIVAN, LLP
24 Attorneys for Defendant Charlie Javice
25 BY: CHRISTOPHER TAYBACK
ERICA PERDOMO
EOIN BEIRNE
KIRSTEN NELSON

SOUTHERN DISTRICT REPORTERS, P.C.
(212) 805-0300

Jury Instructions

“Lorem ipsum dolor sit amet, consectetur adipiscing elit. Nullam ex ex, mattis a tortor ac, congue laoreet massa. Quisque vel justo accumsan, dictum ipsum vel, euismod quam. Nullam scelerisque orci id malesuada semper. Mauris eget ornare enim, in gravida orci.”

Source

